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6 Attorneys for Defendant  
JASON EDWARD THOMAS CARDIFF

8  
9 UNITED STATES DISTRICT COURT  
10 CENTRAL DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 JASON EDWARD THOMAS  
15 CARDIFF,

16 Defendant.

Case No. 5:23-cr-00021-JGB

**JASON CARDIFF'S *EX PARTE*  
APPLICATION TO REMOVE  
CURFEW ORDERED AS A  
CONDITION OF PRETRIAL  
RELEASE**

*[Filed concurrently with Declaration of  
Stephen G. Larson and [Proposed]  
Order]*

**EX PARTE APPLICATION**

By and through counsel of record, Jason Cardiff hereby seeks relief from the curfew imposed as a condition of pretrial release. Should the Court decline to permanently lift his curfew, Mr. Cardiff seeks relief from the curfew for the evening of May 11, 2024, so that he may attend a wedding within a few miles of his current residence.

On November 30, 2023, Mr. Cardiff was ordered released on a \$530,000 appearance bond, justified in the amount of \$500,000 with full deeding of real property. His release conditions include, among other conditions: a travel restriction to the Central District of California and the Southern District of Texas; a curfew between the hours of 8:00 p.m. and 8:00 a.m.; and, placement in the custody of third-party custodian, Attorney Stephen Cochell. Lilia Murphy and Brian Kennedy executed affidavits of sureties in support of the bond. Ms. Murphy also deeded her home as collateral.

Mr. Cardiff is currently living with Attorney Cochell in the Kingwood, Texas, and he is being supervised by United States Probation Officer Jack Sherrod of the Southern District of Texas.

Probation Officer Sherrod advised that U.S. Probation does not oppose the request to permanently remove the curfew condition from Mr. Cardiff's conditions of pretrial release. In explaining his non-opposition, PO Sherrod advised that Mr. Cardiff would still be on "standalone" location monitoring, which would allow U.S. Probation to determine Mr. Cardiff's location at any given time.

Sureties Lilia Murphy and Brian Kennedy do not oppose Mr. Cardiff's request to permanently lift Mr. Cardiff's curfew.

DOJ Attorney Sebastian Manu advised the undersigned that the government opposes Mr. Cardiff's request to permanently remove the curfew condition but does

1 not oppose Mr. Cardiff's request to lift the curfew on May 11, 2024, so that he may  
2 attend a wedding.

3  
4 Dated: May 8, 2024

LARSON LLP

5  
6 By: /s/ Stephen G. Larson

7 Stephen G. Larson

8 Attorneys for Defendant

9 JASON EDWARD THOMAS CARDIFF  
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